

**LITE DEPALMA GREENBERG & AFANANDOR, LLC**

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*Attorney for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI, Civil Action No.: 1:23-cv-02536-KMW-EAP  
Individually and on Behalf of All Others Similarly :  
Situated, :

*Plaintiffs,* :

v. :

CEASERS ENTERTAINMENT, INC., :  
BOARDWALK REGENCY LLC d/b/a CEASERS :  
ATLANTIC CITY HOTEL & CASINO, HARRAH'S :  
ATLANTIC CITY OPERATING COMPANY, LLC :  
d/b/a HARRAH'S RESORT ATLANTIC CITY :  
HOTEL & CASINO, TROPICANA ATLANTIC :  
CITY CORPORATION d/b/a TROPICANA CASINO :  
AND RESORT ATLANTIC CITY, MGM RESORTS :  
INTERNATIONAL, MARINA DISTRICT :  
DEVELOPMENT COMPANY, LLC d/b/a :  
BORGATA HOTEL CASINO & SPA, HARD ROCK :  
INTERNATIONAL INC., SEMINOLE HARD ROCK :  
SUPPORT SERVICES, LLC, BOARDWALK 1000, :  
LLC d/b/a HARD ROCK HOTEL & CASINO :  
ATLANTIC CITY, and CENDYN GROUP, LLC, :

*Defendants.* :

**CERTIFICATION OF BENJAMIN MANNE  
IN SUPPORT OF MOTION  
FOR *PRO HAC VICE* ADMISSION**

I, Benjamin Manne, hereby certify as follows:

1. I am an attorney with the law firm Susman Godfrey L.L.P., 401 Union Street,  
Suite 3000 Seattle, WA 98101.

2. I am a member in good standing of the following bars since being admitted in the years indicated: State of Washington (2019) and U.S. District Court for the Western District of Washington (2020).<sup>1</sup>

3. I am not under suspension or disbarment by any court.

4. I have no disciplinary proceedings pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

5. Susman Godfrey L.L.P. does not maintain an office in the State of New Jersey.

6. I seek to appear and participate in this action on behalf of Susman Godfrey L.L.P. as counsel for Plaintiffs with Mindee J. Reuben, Joseph J. DePalma, and Catherine B. Derenze, of Lite DePalma Greenberg & Afanador, LLC who will serve as counsel of record.

7. If admitted *pro hac vice*, I will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

8. If admitted *pro hac vice*, I will make a payment of \$150.00 on admission to the Clerk, U.S. District Court.

9. If admitted *pro hac vice*, I will abide by L. Civ. R. 101(c).

10. If admitted to appear *pro hac vice* before this Court, I shall strictly observe the rules governing practice in the District of New Jersey, shall submit to the disciplinary jurisdiction of the District Court of New Jersey, and shall strictly observe the dates fixed for scheduling conferences, motions, pretrial conferences, trials or any other proceedings.

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<sup>1</sup> Pursuant to L. Civ. R. 101(c)(1), the following is a list of the names and addresses of the officials or offices that maintain the rolls of the members of the bars to which I am a member: State of Washington (1325 4th Ave suite 600, Seattle, WA 98101) and USDC WDWA (700 Stewart Street, Suite 2310 Seattle, WA 98101).

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 20, 2023

Respectfully submitted,

A handwritten signature in black ink that reads "Benjamin Manne". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Benjamin Manne (*pro hac vice* forthcoming)  
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